

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Vermail v. Noel

Write the full name of each plaintiff.

____ CV ____
(Include case number if one has been assigned)

-against-

COMPLAINT

American Airlines, Airport Security
United Airlines, Airport Security

Do you want a jury trial?
☒ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ **Federal Question**

☐ **Diversity of Citizenship**

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

The Fifth and Fourth Amendments of
the United States Constitution

B. If you checked Diversity of Citizenship**1. Citizenship of the parties**

Of what State is each party a citizen?

The plaintiff, Vermaire Noel, is a citizen of the State of
(Plaintiff's name)

Delaware

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or
subject of the foreign state of

If the defendant is a corporation:

The defendant, American Airlines/United Airlines incorporated under the laws of
the State of Fortworth TX/Chicago IL.

and has its principal place of business in the State of Fortworth TX/Chicago IL.

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____.

If more than one defendant is named in the complaint, attach additional pages providing
information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional
pages if needed.

Vermail v. Noel
First Name Middle Initial Last Name

6 Connell Circle
Street Address

Newark Delaware 19711
County, City State Zip Code

302 547-4332 Vermail v Noel@yahoo.com
Telephone Number Email Address (if available)

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

American Airlines, Airport Security
 First Name Last Name
Airlines
 Current Job Title (or other identifying information)
4333 Amon Carter Blvd.
 Current Work Address (or other address where defendant may be served)
Fortworth Texas 76155
 County, City State Zip Code

Defendant 2:

United Airlines, Airport Security
 First Name Last Name
Airlines
 Current Job Title (or other identifying information)
233 South Wacker Drive
 Current Work Address (or other address where defendant may be served)
Chicago IL 60606
 County, City State Zip Code

Defendant 3:

 First Name Last Name

 Current Job Title (or other identifying information)

 Current Work Address (or other address where defendant may be served)

 County, City State Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence:

World Trade Center (New York City)

Date(s) of occurrence:

September 11th, 2001

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

See attached

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you.

Describe what happened,

What really hurts is how these foreign terrorists were able to bypass what was supposed to be airport safety checks, that failed us instead they were able to hijack two planes that crashed into the World Trade Center. The airport/aviation security negligently unsuccessfully did not handle their obligation to protect passenger jets in contradiction of possible terrorists' attacks, as well as being able to smuggle weapons board a flight. My question why wasn't things run correctly with American Lines and United Airlines with airport safety checks, the lack of security permitted the terrorists to hijack and crash and killed our loves ones. My second question is what was the purpose for security measures specifically? Should it have been to protect against hijackings, with this being said; Someone within airport safety should have known that if terrorist hijack a plane that this would lead to damages, injuries, deaths, property damages. What about properties and other innocent folks on the ground when they decide to crash the planes. Even preparing this paper hurts like if it was happening now, I lost my everything when I lost my husband.

Unbearably, I lost my husband Andy R Noel, by means of Cholangiocarcinoma also known as Bile Duct Cancer on October 17 2011. When American airlines Flight 11 hit the north towers, and the United Airlines flight 175 hit the south towers it changed my husband and our family lives entirely. My husband left home at about 6:30am in the morning September 11, 2001 heading to work at 50 Murray Street, New York, NY 10007, fast-forwarding once he got home about 7pm that wasn't the same husband the left in the morning, our lives never was the same his mental being has changed. However, he continued working at the site until November 22nd 2001.

How you were harmed,

After my husband experienced September 11 2001 terrifying event watching folks fall out of the windows, choking from all the smoke chemicals that saturated the entire area with black smoke and other toxic fumes, while gasping for air, not knowing if you going to walk away alive had to be the worst experience my husband ever encountered. Well, as result it took my husband to another level it mentally as well as emotionally whereas, he was diagnosed with schizophrenia. His entire life made a 360-degree change. He was coded as unemployable. He became ill for several years as we learnt it was a rare cancer that study shows is related to jet fuel inhaling.

Injuries

Describe your injuries and what medical treatment, if any, you required and received.

When my husband inhaled the jet fuel and all the other chemicals and the debris on September 11 2001, that was the day of conception and the processing production of his death. He may have not died that day, but the reality is he inhaled all types of poisonous, deadly, terminal, incurable, irredeemable chemicals that has cause him to die as result to September 11 2001 heartless terrorist who killed my husband!

My husband suffered from day one mentally/emotionally and diagnosed with schizophrenia all this resulted from watching the Towers collapse, hearing the planes crashing into the building, feeling the ground tremble while experiencing a horrifying traumatic Act of terrorist while trying to find a way to escape from the area was the worst thing, he said he has ever dealt with, this helpless position damaged him mentally. The stress was so overwhelming, the sleepless nights, having nightmares, it got so bad he started self-medicating. My husband had to be hospitalized in 2003 it became so unbearable with the nightmares thinking that someone was coming to get us it just went on until he had to be hospitalized for several months. Meanwhile, he started complaining about headaches, pain in his stomach, and how his urine was changing colors, wasn't able to eat, loss over 150lbs from being 240lbs he was 5feet 11, he was always feeling rundown and fatigued, his skin became yellowish off and on for several years and eyes as well, he eventually, jaundice. These systems went on way before he was diagnosed with

cancer, so for the record my husband suffered until his death. He was put on heavy medications all due of this horrifying act that took place at the World Trade Center. Fast-forwarding, dealing with his mental conditions now to find out all he the symptoms were coming from a rare cancer Cholangiocarcinoma also known as Bile Duct Cancer. One of its risk factors comes from being exposure to hazardous chemicals: exposure to certain chemicals have been linked to an increased risk of bile duct cancer. These include dioxins, nitrosamines, polychlorinated biphenyls (PCBs), asbestos, radon and thorotrast (thorium).

His cancer was looked at as unresectable bile duct cancer that cannot be removed with surgery. When we found out he had cancer June 2011 and he passed October 17, 2011. However, he was receiving palliative care that was supposed to help with preventing and treating symptoms or problems caused by the bile duct cancer. He received to stents in placed, he was taking medicines to prevent nausea, pain control, and maintaining the flow of bile where a tumor may block it. Palliative care is focused on helping you feel better, it's not used to treat the cancer and it didn't help him my husband suffered to the end. This hurts so bad knowing my husband life was shortness at the age of 53, through the act of terrorist. The fact is he is never coming back, all because the Airlines Security didn't perform a thorough search as result thousands lost their lives.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

Most important, I want to start by saying I lost the most caring, loving, provider, trustworthy, an excellent husband, great father of 6 children, a wonderful grandfather of 19 grands, and he was taken away from us unfairly. Minding his business at work never knew September 11 2001, was the day his life changed forever. I would like to be awarded 20millions dollars from the defendants American Airline Group Inc. and United Airline Group Inc. for their negligent. My heart to heart believes if security check points was on point my husband would be alive, he died at the age of 53 in hands of terrorist the clearly took over the airport/airlines like they owned it. Instead, I visit his grave of an early death that could've been avoided if things were run properly at that time concerning safety.

Cited-dioxide<https://www.cancercenter.com/cancer-types/bile-duct-cancer/risk-factors>

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

See attached

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

See attached

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

Feb. 4th, 2022
 Dated
Vermail V. Noel
 First Name Middle Initial Last Name
6 Connell Circle
 Street Address
Newark Delaware 19711
 County, City State Zip Code
302 547-4332 vermail v Noel@yahoo.com
 Telephone Number Email Address (if available)

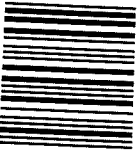
I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

Vermail v. Noel
6 Connell Circle
Newark Delaware
19711

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UNITED STATES

United States District Court
Southern District of New York
500 Pearl Street, New York, N.Y.
10007, Att: Pro-se Office

